

EXHIBIT 1

SECOND DECLARATION OF SCOTT DE HAAS

I, Scott de Haas, hereby declare as follows:

1. My name is Scott de Haas. I am a citizen of the United States and am at least eighteen years of age. I have personal knowledge of and am competent to testify as to the facts herein.

2. As I noted in my first declaration, which I signed on February 27, 2019, Roku's engineering of the casting and mirroring functions allowing content from a mobile device to be shown on another display is headquartered in Los Gatos, California, and, but for one employee that resides in Reno, Nevada, occurs in Los Gatos, California.

3. I understand that several Austin-based employees have been suggested as potentially working on this functionality, including Ben Combee, Ken Krakow, Marcus Grande, Matthew Hodgins, Rob Edgell, Roger Sunshine, Wes Guidry, and Yi He. I am familiar with each of these employees and their past and current projects at Roku. None of these employees (nor any other Austin employee) work on the casting and mirroring functions allowing content from a mobile device to be shown on another display.

4. Furthermore, none of these employees (nor any other Austin employee) are involved in the design or implementation of technology related to enabling content transfer from a mobile phone to the accused Roku players and televisions. Roku's engineering related to this function occurs in Los Gatos.

5. None of these employees (nor any other Austin employee) are involved in the design or implementation of technology related to authentication protocols between a mobile phone and the accused Roku players and televisions. Roku's engineering related to this function occurs in Los Gatos.

6. None of these employees (nor any other Austin employee) are involved in the design or implementation of technology related to authentication protocols between the accused Roku technology and a destination display. Roku's engineering related to this function occurs in Los Gatos.

7. None of these employees (nor any other Austin employee) are involved in the design or implementation of channel apps, including apps that stream live content. Roku's engineering related to this function occurs in Los Gatos.


8. Matthew Hodgins is a quality assurance engineer that has worked to develop a test environment tool for the Roku platform. Mr. Hodgins work in developing a test environment tool is separate from the development of the features and functions of the Roku platform. He has not worked on or been part of the development of applications, including the Roku iOS or Roku Android apps.

9. None of these employees (nor any other Austin employee) work on upconversion of content from mobile apps. Roku's engineering related to this function occurs in Los Gatos.

10. Roku's Austin office is home to several TV engineers. None of these employees work on any of the subject matter discussed in the previous paragraphs.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: 3/25/19


Scott de Haas